

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

'08 MJ 848

UNITED STATES OF AMERICA,

Plaintiff,

v.

Jesus Antonio MORA-Quinonez (1)

Lorena Hayde PRINCE de Mora (2)

Defendant.

} Magistrate Case No.: -

} COMPLAINT FOR VIOLATION OF

} 21 U.S.C. § 952 & 960  
Importation of a Controlled Substance  
(Felony)

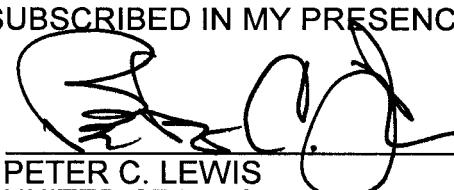
15 The undersigned complainant being duly sworn states:

16 That on or about May 31, 2008, within the Southern District of California,  
17 defendant Jesus Antonio MORA-Quinonez and Lorena Hayde PRINCE de Mora did  
18 knowingly and intentionally import approximately 26.16 kilograms (57.55 pounds) of  
19 cocaine a Schedule II Controlled Substance, in violation of Title 21, United States  
20 Code, Section 952 & 960.

21 The complainant states that this complaint is based on the attached Statement  
22 of Facts incorporated herein by reference.

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24 Special Agent Christopher Miller  
U.S. Immigration and Customs Enforcement

26 SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, THIS 2ND,  
27 DAY OF JUNE 2008.

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29 PETER C. LEWIS  
UNITED STATES MAGISTRATE JUDGE

1 UNITED STATES OF AMERICA  
2  
3

v.

4 Jesus Antonio MORA-Quinonez  
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Lorena Hayde PRINCE de Mora

7 STATEMENT OF FACTS  
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This statement of facts is based on the reports, documents, and notes furnished  
to US Immigration and Customs Enforcement Special Agent Christopher Miller.  
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On May 31, 2008 at approximately 1115 hours, Jesus Antonio MORA-Quinonez  
and Lorena Hayde PRINCE de Mora entered the United States at the Calexico,  
California, West Port of Entry. MORA was the driver, PRINCE, and two juvenile  
females were the passengers of a 2003 Chevrolet Suburban, bearing Baja California,  
Mexico license plate AHT1444. The two juvenile females were subsequently released  
by agents. During a pre-primary roving operation, Canine Enforcement Officer (CEO)  
Parrish and his Human Narcotic Detector Dog (HNDD) "Josey" (CG-65) were utilized on  
MORA's vehicle. HNDD "Josey" alerted and responded to the spare tire of MORA's  
vehicle. CBPO Lopez was notified of the alert and received a negative oral Customs  
declaration from MORA. The vehicle was referred to the secondary lot for closer  
examination.  
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In the vehicle secondary lot, CBPO Mendibles utilized a density meter on the  
spare tire mounted underneath MORA's vehicle. The spare tire had abnormally high  
readings. CBPO Ortiz noticed that the spare tire contained five lugs on the wheel and  
the wheels mounted on the vehicle contained six lugs. CBPO Ortiz opened the spare  
tire revealing packages.  
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A subsequent inspection of the spare tire revealed 25 packages. One of the  
packages was probed and a sample of a white powdery substance was obtained, which  
field tested positive for cocaine. The 23 packages had a combined net weight of  
approximately 26.16 kilograms (57.55 pounds).  
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1 PRINCE was placed under arrest and advised of her Constitutional Rights, which  
2 she acknowledged and waived, agreeing to answer questions. PRINCE stated her  
3 husband MORA was the registered owner of the vehicle, but she was the primary user  
4 of the vehicle. PRINCE explained that to her knowledge the vehicle had been in her or  
5 MORA's control.

6 MORA was placed under arrest and advised of his Constitutional Rights, which  
7 he acknowledged and waived, agreeing to answer questions. MORA stated that he  
8 was the registered owner of the vehicle. MORA stated that on May 30, 2008, he and  
9 PRINCE went to Jesus Geraz' place and a spare tire was mounted on his vehicle.  
10 MORA gave conflicting statements and stated that he drove the suburban to Mr. Geraz'  
11 place alone.

12 PRINCE denied going anywhere with MORA except to eat hamburgers.  
13 PRINCE denied knowledge of any changing of the spare tires and further stated that  
14 MORA did not drive her suburban the night before their arrest.

15 MORA and PRINCE were placed under arrest and were booked into the Imperial  
16 County Jail pending their initial appearance before a U.S. Magistrate Judge.

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